



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

MEMORANDUM

DATE: MAR 4 2003

TO : The Commission
Todd A. Stevenson, Secretary *WLSM*

Through: W. H. DuRoss, III, General Counsel *PS*
Patricia Semple, Executive Director

FROM : Jacqueline Elder, *le* Acting Assistant Executive Director,
Office of Hazard Identification and Reduction
Celestine T. Kiss, Project Manager, *CK*
Division of Human Factors,
Directorate for Engineering Sciences

SUBJECT: Staff Response to a Question from Commissioner
Moore on Petition for Rule Requiring Product
Registration Cards (CP 01-1)

During the February 21, 2003 staff briefing on Petition CP 01-1, Commissioner Moore asked about a product registration regulation issued by the National Highway Traffic Safety Administration for tires.

The regulation in question is 49 CFR Part 574, Tire Identification and Recordkeeping. It was established to facilitate notification to purchasers of defective or nonconforming tires, so that they can take appropriate actions in the interest of safety. It requires tire dealers and distributors to supply to the purchaser a registration form already filled out with:

- (1) The entire identification number of the tire(s) sold or leased to the tire purchaser;
- (2) The distributor's or dealer's name and address or other means of identification known to the tire manufacturer.

It is then the purchaser's responsibility to fill in his/her name and address and mail the card. The regulation does not specifically state that the card must be postage paid by the manufacturer, dealer or distributor.

The original regulation required the dealer or distributor to fill in all the information, including the purchaser's information and return the card. However, in order to reduce the

NOTE: This document has not been
reviewed or accepted by the Commission.
Initial *rh* Date *3/4/03*

CPSA 6 (b)(1) Cleared *3/4/03*
X No Mfrs/Prvtlbrs or
Products Identified
Excepted by

Below is a copy of the card required for this regulation.

1. Preprinted tire manufacturer's name - unless the manufacturer's name appears on the reverse side of the form

Figure 3a - Registration form for independent distributors and dealers - tire identification number side